

1 Lawrence J. Semenza, III, Esq., Bar No. 7174  
2 Email: ljs@skrlawyers.com  
3 Christopher D. Kircher, Esq., Bar No. 11176  
4 Email: cdk@skrlawyers.com  
5 Jarrod L. Rickard, Esq., Bar No. 10203  
6 Email: jlr@skrlawyers.com  
7 Katie L. Cannata, Esq., Bar No. 14848  
8 Email: klc@skrlawyers.com  
9 SEMENZA KIRCHER RICKARD  
10 10161 Park Run Drive, Suite 150  
11 Las Vegas, Nevada 89145  
12 Telephone: (702) 835-6803  
13 Facsimile: (702) 920-8669

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15 *Attorneys for Defendant Wild West Helicopters Inc.*

16 **UNITED STATES DISTRICT COURT**

17 **DISTRICT OF NEVADA**

18 PAUL REIFFER,

19 Plaintiff,

20 vs.

21 WILD WEST HELICOPTERS INC.,

22 Defendant.

23 Case No. 2:23-cv-00032-RFB-EJY

24 **STIPULATION AND ORDER TO  
25 EXTEND TIME TO RESPOND TO  
26 COMPLAINT BY 30 DAYS**

27 **[First Request]**

28 This stipulation is entered into by Plaintiff Paul Reiffer ("Plaintiff"), by and through his  
19 counsel of record Trey A. Rothell, Esq., of Randazza Legal Group, PLLC, and Defendant Wild  
20 West Helicopters Inc. ("Defendant"), by and through its counsel of record Jarrod L. Rickard,  
21 Esq., of Semenza Kircher Rickard, with reference to the following facts and recitals:  
22

23 1. Defendant was previously served with the Complaint filed by Plaintiff in this  
24 action;

25 2. On February 17, 2023, counsel for Defendant requested a 30-day extension of  
26 time to respond to the Complaint from counsel for Plaintiff;

27 3. Counsel for Defendant's request is based on the fact that he was just recently  
28 retained and requires time to get up to speed. Additionally, the Parties seek time to engage in

SEmenza Kircher Rickard  
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Telephone: (702) 835-6803

1 settlement discussions and wish to avoid the unnecessary incurrence of attorney's fees and use  
2 judicial resources;

3       4. Based upon this request, the Parties have agreed to continue the deadline to  
4 respond to the Complaint to March 17, 2023; and

5       5. Defendant has not previously requested an extension of the deadline to answer,  
6 move or otherwise respond to the complaint.

7       NOW, THEREFORE, the parties hereby stipulate and agree, subject to Court approval, to  
8 extend the date by which Defendant is required to answer, move, or otherwise respond to the  
9 complaint to **March 17, 2023**.

10       Nothing in this stipulation shall be construed as a waiver or relinquishment of any  
11 party's rights, remedies, objections, or defenses, all of which are expressly reserved.

12 DATED this 22nd day of February, 2023.

13 SEMENZA KIRCHER RICKARD

15 /s/ Jarrod L. Rickard

16 LAWRENCE J. SEMENZA, III, ESQ.  
Nevada Bar No. 7174

17 CHRISTOPHER D. KIRCHER, ESQ.  
Nevada Bar No. 11176

18 JARROD L. RICKARD, ESQ.  
Nevada Bar No. 10203

19 KATIE L. CANNATA, ESQ.  
Nevada Bar No. 14848

20 10161 Park Run Drive, Suite 150  
Las Vegas, Nevada 89145

22 *Attorneys for Defendant Wild West Helicopters  
Inc.*

DATED this 22nd day of February, 2023.

RANDAZZA LEGAL GROUP, PLLC

/s/ Trey A. Rothell

MARC J. RANDAZZA, ESQ.  
Nevada Bar No. 12265

TREY A. ROTHELL, ESQ.  
Nevada Bar No. 15993  
4974 S. Rainbow Boulevard, Suite 100  
Las Vegas, Nevada 89118

*Attorneys for Plaintiff Paul Reiffer*

24 **IT IS SO ORDERED.**

25   
26 Layna J. Zouchal  
UNITED STATES MAGISTRATE JUDGE

27 DATED: February 22, 2023

SEmenza Kircher Rickard  
10161 Park Run Drive, Suite 150  
Las Vegas, Nevada 89145  
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